

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

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In re: : Chapter 11
: :
GORDMANS STORES, INC., *et al.*,¹ : Case No. 17-80304 (TLS)
: Jointly Administered
: :
Debtors. : **Hearing Date: TBD**
: **Objection Deadline: Monday, June 26, 2017**
: **Related to Docket No. 428**
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**REQUEST OF US BANK N.A. dba US BANK EQUIPMENT FINANCE
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE
CLAIM PURSUANT TO 11 U.S.C. §§ 503(a), 503(b)(1)(A) AND 365**

COMES NOW US Bank N.A. dba US Bank Equipment Finance (the "Bank"), by and through its attorneys, and respectfully requests allowance and payment by Gordman's, Inc. (the "Debtor") of its administrative expense claim pursuant to, without limitation, 11 U.S.C. §§ 503(a), 503(b)(1)(A), and 365 (the "Request"), and in support of the Request, states as follows:

1. On March 13, 2017 (the "Petition Date"), the above captioned debtors (the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code").

2. The Bank files this Request pursuant to the Court's May 5, 2017 order setting an administrative bar date of June 5, 2017 (Docket No. 428).

3. The Bank's administrative expense claim consists of post-petition use and possession charges due from the Debtor under multiple equipment leases, particularly copy machines leases (the "Leases"), which the Debtor has not paid in the current amount of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, include: Gordmans Stores, Inc. (1987); Gordmans, Inc.(1211); Gordmans Management Company, Inc. (65281); Gordmans Distribution Company, Inc. (5421); Gordmans Intermediate Holdings Corp. (9938); and Gordmans LLC (1987). The location of the debtors' service address is: 1926 South 67th Street, Omaha, Nebraska 68106.

\$14,937.84, as set forth in the itemization annexed hereto as Exhibit "A. To the best of the Bank's knowledge, no rejection of the Leases has occurred to date.²

4. The Bank is entitled to and seeks allowance and payment of its administrative expense claim pursuant to, without limitation, 11 U.S.C. §§ 503(b)(1)(A), 507(a)(2), and 365. The administrative claim is an actual and necessary cost and expense of preserving the Debtor's estate under Section 503(b)(1)(A) of the Bankruptcy Code, which is entitled to priority under Section 507(a)(2).

5. The Bank reserves its right to amend its administrative expense claim and to seek additional amounts due under the Leases related to the period between the Petition Date and the effective date of any assumption and assignment or rejection of the Leases.

WHEREFORE, the Bank respectfully requests that this Court enter an Order allowing its administrative expense claim, as may be amended as set forth herein, compelling payment of its administrative expense claim by the Debtor, and granting such other and further relief as this Court deems just and proper.

**U.S. Bank National Association d/b/a U.S. Bank
Equipment Finance**, Creditor and Interest Party

By: /s Patrick R. Turner
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AND

² It is possible, however, that some of the underlying copy machines leases to Debtor have been sold with the Bank's agreement, however the dates of any such sales are not known to the Bank at this time.

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